

## Memorandum



DATE : August 2, 1978

TO : I. C. Holbrook

FROM : A. A. Mandapat *A. A. M.*

SUBJECT : Material Management Comments on Rough Draft #2  
of Proposed Departmental Instruction Entitled:  
"Polychlorinated Biphenyls (PCBs), Identification  
Cleanup and Disposal"

The following are our comments on the above subject draft:

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- The title "Manager of Electric Stations" is confusing. If the position now filled by Ivan Holbrook is intended, the title "Manager, Station Construction and Maintenance" would be correct according to the Operations Division organization chart dated 8/1/78.
- The format of this instruction does not follow the standard format for department policy and procedure as specified by City ordinance 101810. We suggest that this subject be documented in final form by Administrative Services. (See also City S.O.P. 100-001.)
- It appears from the design of the PCBs Equipment Record that you intend to have a new card originated each time PCBs equipment is installed in a new location or moved to the warehouse for storage or disposal. The disposition of the old PCBs Equipment Record cards is unclear. We assume they will be destroyed leaving only the latest cards in the master and field files.
- We suggest provision in the document for a regular PCBs Equipment Audit to assure the accuracy of the PCBs Master Equipment Record.

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- Concerning the annual report of PCBs equipment activity, it is unclear if each supervisor will design his/her own report or if the Manager of Electric Stations will design a PCBs Equipment Movement Log for use by all supervisors. A copy of such a log would be a simple method of executing the annual report requirement.
- Identification - We assume that the Manager of Electric Stations will obtain and distribute the required labels.

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Page 2, 3 and 4

- We cannot find any statement as to who has the responsibility for affixing the necessary labels to field or warehouse PCBs equipment.

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- Limiting storage of PCBs equipment to 30 days will require a truck trip to the Idaho disposal site every month even if we don't have a truckload. This does not appear to be cost effective. Further, when the Idaho site is closed, we have been notified that the only remaining site will be located in Texas. We do not feel that stating a definite period of storage at the South Service Center is necessary. A more workable statement would include a rough volume or weight of PCBs equipment which, when accumulated, would provide a cost effective load or shipment.

DY:kc

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